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Via Facsimile - (262) 796-5800

Pat Dunphy, Esq.
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595 North Barker Road
P.O. Box 1750
Brookfield, Wisconsin 53008-1750

Re: Estate of Michael Edward Bell, et al v. Officer Erich R. Strausbaugh, et al
Case No. 05-C-1176

Dear Pat:

I did some research on the issue of whether it is appropriate for a Court to order sequestration of named parties for purposes of depositions. Although it can be done, it is only appropriate in "extraordinary circumstances," which I do not believe are present in this case.

I believe I am going to want to conduct some written discovery before I depose Mr. Bell. Accordingly, please let me know some dates in early March when Kim and Shantae Bell will be available for deposition and where you would like the depositions to take place.

As soon as you have finalized your choice of dates for the four officers, let me know.

Thank you very much.

Very truly yours,

GUNTA & REAK, S.C.

Kevin P. Reak
(TMP)

Kevin P. Reak

KPR/tmp

cc: Chief Daniel Wade
Captain Randall P. Berner
Jeff Warnock, Risk Manager
Patrick J. Sheehan, Esq.